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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 16-00227-SI-5
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME;
)	[PROPOSED] ORDER
v.)	
)	
BTC-E, A/K/A CANTON BUSINESS)	
CORPORATION,)	
)	
and)	
)	
ALEXANDER VINNIK,)	
)	
Defendants.)	

The parties appeared before the Court for a status conference on September 8, 2023. At that time, a new trial date of September 30, 2024, was set at the request of the parties. In addition, it was

1 stipulated by and between counsel for the United States and counsel for the defendant, Alexander
 2 Vinnik, that time be excluded under the Speedy Trial Act from September 8, 2023, through September
 3 30, 2024. This time exclusion will allow defense counsel, who have newly appeared in this matter, to
 4 prepare, including by reviewing the significant volume of discovery in this matter. For this reason, the
 5 parties stipulate and agree that excluding time from September 8, 2023, through September 30, 2024,
 6 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
 7 further stipulate and agree that the ends of justice served by excluding the time from September 8, 2023,
 8 through September 30, 2024, from computation under the Speedy Trial Act outweigh the best interests
 9 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 Undersigned government counsel certify that they have obtained approval from counsel for the
 11 defendant to file this stipulation and proposed order.

12
 13 IT IS SO STIPULATED.

ISMAIL J. RAMSEY
 United States Attorney

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 15
 16 DATED: September 8, 2023

/s/
 CLAUDIA QUIROZ
 KATHERINE LLOYD-LOVETT
 Assistant United States Attorneys
 C. ALDEN PELKER
 Trial Attorney, CCIPS Assistant United States
 Attorney

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 19
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 21 DATED: September 8, 2023

/s/ Aleksandr Gruzman
 ALEKSANDR GRUZMAN
 ARKADY BUKH Counsel for Defendant
 ALEXANDER VINNIK

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from September 8, 2023, through September 30, 2024, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from September 8, 2023, through September 30, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from September 8, 2023, to September 30, 2024, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: _____

HON. SUSAN ILLSTON
United States District Judge